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rel. its Department of Corrections*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

DONALD WALDEN JR, NATHAN
ECHEVERRIA, AARON DICUS, BRENT
EVERIST, TRAVIS ZUFELT, TIMOTHY
RIDENOUR, and DANIEL TRACY on behalf
of themselves and all others similarly situated,

Plaintiffs,

v.

THE STATE OF NEVADA, *EX REL.* ITS
NEVADA DEPARTMENT OF
CORRECTIONS, and DOES 1-50,

Defendants.

Case No.: 3:14-cv-00320-MMD-WGC

**STIPULATION FOR EXTENSION OF
TIME TO FILE PLAINTIFFS' MOTION
FOR CLASS CERTIFICATION
PURSUANT TO FRCP 23 AND
DEFENDANTS' MOTION TO
DECERTIFY FLA COLLECTIVE
ACTION**

(First Request)

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, Donald
Walden Jr., Nathan Echeverria, Aaron Dicus, Brent Everist, Travis Zufelt, Timothy Ridenour,
and Daniel Tracy, on behalf of themselves and all others allegedly similarly situated
("Plaintiffs"), by and through their counsel of record, and Defendant State of Nevada, *ex rel.* its

Department of Corrections (“NDOC”), by and through its counsel of record, that the time in which the Parties shall have to file Fed. R. Civ. P. 23 and FLSA decertification motions shall be extended past the current deadline of Friday, December 22, 2017 (ECF No. 121) as follows:

1) Plaintiffs’ Motion for FRCP 23 Class Certification shall be filed on or before, Wednesday, January 31, 2018. Defendants’ Opposition to FRCP 23 Class Certification shall be filed on or before, Wednesday February 28, 2018. Plaintiffs’ Reply in support of Plaintiffs’ FRCP 23 Class Certification shall be filed on or before Wednesday, March 21, 2018.

2) Defendants’ Motion to Decertify FLSA Collective action shall be filed on or before, Wednesday, January 31, 2018. Plaintiffs’ Opposition to Decertify shall be filed on or before, Wednesday February 28, 2018. Defendants’ Reply in support of Defendants’ Motion to decertify shall be filed on or before Wednesday, March 21, 2018.

The case involves class certification, decertification of a previously certified collective action, and complex legal arguments. The Parties have engaged in discovery to create a detailed factual record. The Parties request the additional time in light of the recently completed expert depositions, the extensive discovery in the form of multiple site inspections, voluminous disclosures and written discovery, depositions of five (5) PMKs, seven (7) named Plaintiffs, twenty-five (25) opt-ins Plaintiffs, and in order to allow for previously planned counsel and staff vacations scheduled to take place over the end of the year holidays.

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Counsel certifies that this request is made in good faith and not for the purposes of delay.

Dated this 12th day of December 2017.

Dated this 12th day of December 2017

THIERMAN BUCK LLP

WILSON ELSEY MOSKOWITZ EDELMAN
& DICKER LLP

/s/ Leah L. Jones

/s/ Richard I. Dreitzer

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*Attorneys for Defendant State of Nevada,
ex rel. its Department of Corrections*

ORDER

IT IS SO ORDERED.

DATED this 12th day of December 2017.



UNITED STATES DISTRICT JUDGE